

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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Georgia Arendt, Individually and as  
Special Administrator of the Estate of  
Anthony Arendt, Deceased,

Plaintiff,  
v.  
Case No. 1:13-cv-727-WCG

Owens-Illinois, Inc.,

Defendant.

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**DECLARATION OF RACHEL REMKE  
IN SUPPORT OF OWENS-ILLINOIS, INC.'S  
MOTION FOR SUMMARY JUDGMENT**

I, Rachel A. Remke, declare as follows:

1. I am an attorney with the law firm of Schiff Hardin LLP and counsel in this case for Defendant Owens-Illinois, Inc. I make this declaration upon my own personal knowledge in support of Owens-Illinois, Inc.'s Motion for Summary Judgment (ECF No. 49). If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. Attached as **Exhibit A** is a copy of Plaintiff's Complaint from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

3. Attached as **Exhibit B** is a copy of Plaintiff's Response to Standard Interrogatories from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir.

Ct. Brown Cty. filed Aug. 3, 2009).

4. Attached as **Exhibit C** is a copy of The Selmer Company's Motion to Dismiss Plaintiff's Complaint from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

5. Attached as **Exhibit D** is a copy of Defendant The Boldt Company's Motion for Summary Judgment from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

6. Attached as **Exhibit E** is a copy of Taylor Insulation Company, Inc.'s Joinder in Selmer Company's Motion to Dismiss from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

7. Attached as **Exhibit F** is a copy of Defendant Reeke-Marold Company, Inc.'s Joinder to Defendants' Motion to Dismiss and Motion for Summary Judgment from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

8. Attached as **Exhibit G** is a copy of The Selmer Company's Notice of Motion and Motion for Sanctions from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

9. Attached as **Exhibit H** is a copy of The Selmer Company's Reply Brief in Support of Its Motions to Dismiss and for Sanctions and Brief in Opposition to Plaintiff's Motion for Voluntary Dismissal from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

10. Attached as **Exhibit I** is a copy of Plaintiff's Consolidated Response to

Defendants' Motions to Dismiss and for Costs and Plaintiff's Motion for Voluntary Dismissal with Prejudice and Without Costs from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

11. Attached as **Exhibit J** is a copy of the Order for Dismissal from *Anthony Arendt v. The Boldt Company et al.*, No. 09-cv-2124 (Wis. Cir. Ct. Brown Cty. filed Aug. 3, 2009).

12. Attached as **Exhibit K** is a copy of Plaintiff's Complaint from *Anthony Arendt v. AW Chesterton Company et al.*, No. 1:09-cv-00757-WCG (E.D. Wis. filed Aug. 5, 2009).

13. Attached as **Exhibit L** is a copy of Amended Administrative Order No. 12 from *In Re: Asbestos Products Liability Litigation (No. IV)*, No. MDL 875 (E.D. Pa.).

14. Attached as **Exhibit M** is a copy of Plaintiff's Administrative Order No. 12 Submission from *Anthony Arendt v. AW Chesterton Company et al.*, No. 12-2065 (3d Cir. filed Apr. 24, 2012).

15. Attached as **Exhibit N** is a copy of Plaintiff's First Response to Standard Interrogatories from *Anthony Arendt v. AW Chesterton Company et al.*, No. 1:09-cv-00757-WCG (E.D. Wis. filed Aug. 5, 2009).

16. Attached as **Exhibit O** is a copy of Plaintiff's Verified Response to Standard Interrogatories from *Anthony Arendt v. AW Chesterton Company et al.*, No. 1:09-cv-00757-WCG (E.D. Wis. filed Aug. 5, 2009).

17. Attached as **Exhibit P** is a copy of the Order of March 12, 2012 from *Anthony Arendt v. AW Chesterton Company et al.*, No. 1:09-cv-00757-WCG (E.D. Wis. filed

Aug. 5, 2009).

18. Attached as **Exhibit Q** is a copy of Plaintiff's Status Report Pursuant to Administrative Order No. 12 from *Georgia Arendt, individually and as Special Administrator of the Estate of Anthony Arendt, deceased, v. AW Chesterton Company et al.*, No. 1:13-cv-00727-WCG (E.D. Wis. filed June 26, 2013).

19. Attached as **Exhibit R** is a copy of excerpts of the deposition transcript of the March 9, 2012 deposition of Anthony Arendt from *Anthony Arendt v. AW Chesterton Company et al.*, No. 1:09-cv-00757-WCG (E.D. Wis. filed Aug. 5, 2009).

Dated: May 1, 2015

Respectfully submitted,

By: /s/Rachel A. Remke  
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Owens-Illinois, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on May 1, 2015, these papers were filed with the Clerk of the Court for the United States District Court for the Eastern District of Wisconsin using the CM/ECF system, which will send notification of such filing upon all parties who have appeared.

/s/ Rachel A. Remke  
Rachel A. Remke

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